

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

-----X  
SALIM WILSON,

Plaintiff,

Date Filed:

Index No.

**VERIFIED  
COMPLAINT**

-against-

THE CITY OF NEW YORK, DETECTIVE DANIEL  
BRADY, and DETECTIVE DAVID TERRELL,

Defendants.

-----X

Plaintiff, SALIM WILSON by his attorneys, NWOKORO & SCOLA, ESQUIRES,  
respectfully alleges upon information and belief as follows:

1. At all times mentioned, Plaintiff SALIM WILSON, was a resident of Bronx County, City and State of New York.
2. At all times mentioned, the CITY OF NEW YORK, was and is a municipal corporation duly organized and existing by virtue of the laws of the State of New York.
3. That with respect to the arrest and consequent proceedings beginning on February 11, 2014, and terminating on September 6, 2016, on or about December 5, 2016 and within 90 days after the claim herein arose, the plaintiff served a Notice of Claim in writing sworn to on their behalf upon the defendant CITY OF NEW YORK, by delivering a copy thereof in duplicate to the officer designated to receive such process

personally, which Notice of Claim advised the Defendant City of New York, of the nature, place, time and manner in which the claim arose, the items of damage and injuries sustained so far as was then determinable and the claim was assigned the claim number 2016P1034301 by the New York City Comptroller's Office.

4. At least thirty (30) days have elapsed since the service of the notices of claim prior to the commencement of this action and adjustment of payment thereof has been neglected or refused, and this action has been commenced within one year and ninety (90) days after the happening of the event upon which the claims are based.
5. The plaintiff has complied with the request of the municipal Defendants for an oral examination pursuant to Section 50-H of the General Municipal Law and/or the Public Authorities Law and/or no such request was made within the applicable period.
6. Upon information and belief, at all times mentioned, Defendants Detective Daniel Brady and Detective David Terrell were and are police officers of the Defendant City of New York employed by the New York City Police Department (NYPD) and at all times herein were acting in such capacity as the agents, servants and employees of the Defendant, THE CITY OF NEW YORK.

## FACTS

7. On Friday January 31, 2014, at approximately 9:10 p.m., two male individuals, Darin Capehart and Ramon Padilla, were shot inside the lobby of 730 East 166<sup>th</sup> Street, Bronx, New York. Victim Capehart was shot multiple times in the torso, causing his death. Victim Padilla was shot three times in his buttocks and twice in his left leg, but survived.
8. Immediately following the shooting, on January 31, 2014, Padilla told investigating Detective Daniel Brady, that an unknown shooter approached him and his friend Darin, and started shooting a firearm for unknown reasons.
9. On or about February 11, 2014, at approximately 2:00 p.m., plaintiff was leaving a court room located at 161 Street, in the Bronx, when he was accosted by three plain clothes officers from the Warrant Squad whose names are currently unknown, and arrested. The officers arrested plaintiff at the behest of and under the instruction of Detective Daniel Brady.
10. On or about February 11, 2014, plaintiff was arrested by Detective Daniel Brady and charged with Murder, Attempted Murder, Assault, Attempted Assault, and Criminal Possession of a loaded firearm, all related to the shooting incident that occurred on January 31, 2014.
11. Plaintiff was interrogated by the warrant officers, who asked him to identify himself. When plaintiff identified himself, the police officers

told him that they had a warrant for his arrest and he had to come with them for questioning. The police officers handcuffed the plaintiff, searched him, took him outside the building and placed him in a police van, then transported him to the 42<sup>nd</sup> Precinct of the NYPD located at 830 Washington Avenue, Bronx, New York.

12. At the 42<sup>nd</sup> Precinct, plaintiff was again searched and his cell phone, keys, identification cards and all the cash that he had on him were seized by the defendants. Plaintiff's property was never returned to him.
13. At the 42<sup>nd</sup> Precinct, plaintiff was taken straight to an interrogation cell on the second floor. Plaintiff was handcuffed to the wall and left there to wait for approximately four hours, without food, water, or the ability to use the bathroom.
14. Eventually Det. Brady entered the interrogation and began to interrogate the plaintiff. He told the plaintiff, "you know what you did? You know why you are here?". Brady told the plaintiff he was under arrest for murder and was responsible for shooting the victim. He then showed plaintiff a photograph of the victim of the shooting, whom plaintiff did not recognize.
15. That day and the next day, while in the interrogation cell, plaintiff was interrogated for hours on end by Detective Brady and Detective David Terrell, all the while, plaintiff pleaded his innocence.

16. Defendant Terrell was particularly aggressive with the plaintiff and threatened him with physical harm. Det. Terrell told the plaintiff "You want to play fucking dumb, you better tell me something before you spend the rest of your life in jail. We know you had something to do with it or you know something. Stop fucking around before I bash your head in". Mr. Wilson repeatedly told the defendants that he was innocent and did not know what they were talking about.
17. During the course of the interrogation, Det. Brady told the plaintiff that the shooting had occurred on the night of January 31, 2014, at 730 East 166<sup>th</sup> Street, Bronx, New York. Plaintiff then informed Brady and Terrell that that night, he couldn't be the shooter because that afternoon and night he was at a memorial service for his best friend, Damian Nunez, at 905 Tinton Avenue, Bronx, New York, and that other people who attended the memorial could vouch for the fact that he was at the Memorial from approximately 4:00 p.m. to approximately 12:00 midnight, and therefore could not have been the shooter.
18. On or about February 12, 2014, plaintiff was taken to Central Booking in the Bronx.
19. That while plaintiff was being detained, defendants Brady and Terrell, completed arrest paperwork, in which they swore in part, that plaintiff had committed a crime and or offense.

20. That the factual claims made by the defendants, were materially false and the defendants knew it to be materially false at the time they first made it, and every time thereafter, when they repeated it.
21. That defendants Brady and Terrell, forwarded these false allegations to the Bronx County District Attorney (BCDA) in order to justify the arrest and to persuade the BCDA to commence the plaintiff's criminal prosecution.
22. That as a direct result of these false allegations by the defendant police officers, the plaintiff was criminally charged in the Supreme Court of the State of New York, Criminal Term, Bronx County, under case number 00630-2014 with the crimes of murder, attempted murder, assault, attempted assault, possession of a loaded firearm and manslaughter, all relating to the shooting incident on January 31, 2014.
23. That the plaintiff remained in the custody of the defendant police officers until he was brought before a Judge of the Criminal Court, Bronx, County, arraigned, and further detained. Plaintiff was remanded without bail and spend the next 31 months in various correctional facilities within the City of New York, including Riker's Island and the Boat.
24. The arrest of the plaintiff on or about February 11, 2014, was without probable cause.

25. The arrest of the plaintiff on or about February 11, 2014 was motivated by malice and a desire on the part of the defendant police officers to injure the plaintiff and to increase by unlawful and underhanded means, the number of arrests credited to the defendants, as a way of advancing their careers as police officers.
26. That at no time prior to or during the above events was there probable cause to arrest the plaintiff, nor was it reasonable for the defendants to believe that probable cause existed.
27. Defendants Brady and Terrell intentionally and deliberately gave false statements and/or failed to file accurate or corrective statements.
28. Upon information and belief, the arresting Police Officer who initiated the arrest of the plaintiff and led the investigation into the shooting incident of January 31, 2014, was Det. Daniel Brady.
29. Upon information and belief, Det. Terrell assisted in the investigation and interrogation of the plaintiff and in so doing, improperly suborned and coerced witnesseses into giving false evidence against the plaintiff, all in tandem with Det. Brady who also suborned witnesses and coerced witnesses into giving false testimony against the plaintiff.
30. On or about February 1, 2014, and the days immediately following that day, Detectives Terrell and Brady interrogated witness and Victim Ramon Padilla at various locations including, Lincoln Hospital, and at the 42<sup>nd</sup> Precinct, during this interrogations, Detectives Brady and

Terrell suggested to Mr. Padilla and other witnesses that they already knew who the shooters were and suggested to Mr. Padilla and the other witnesses that the perpetrators of the shooting were plaintiff Wilson, and Julio Velazquez.

31. Upon information and belief Detective Brady alternatively threatened and cajoled Mr. Padilla and another unidentified witness into identifying plaintiff Salim Wilson, and criminal co-defendant Julio Velazquez as the perpetrators of the shooting although the detectives had no reasonable basis to believe that Mr. Wilson was involved in the shooting.
32. Upon information and belief, Detective Terrell threatened Mr. Padilla and another unidentified witness with physical harm and arrests, in order to get them to wrongly identify Salim Wilson as one of the people involved in the shooting of January 31, 2014.
33. That on or about February 11, 2014, Detective Brady arranged and administered a photo array identification procedure whereupon Raymond Padilla, a witness and victim of the shooting, identified plaintiff Wilson as "the person who handed the shooter the gun when we got shot".
34. That during this photo array, Detective Brady improperly assisted the witness, Raymond Padilla, in picking out the photograph of the plaintiff Salim Wilson, and suggested to the witness that, he, Detective Brady,

had other evidence linking Mr. Wilson to the shooting, when in fact, there was no such evidence.

35. That the photo array conducted by Detective Brady improperly contained two photographs of the plaintiff, Salim Wilson.
36. That on or about February 12, 2014, Detective Brady arranged and administered a line up procedure where Mr. Wilson was identified by witness Raymond Padilla, as being involved in the shooting of January 31, 2014. During this procedure, Det. Brady improperly tampered with the procedure by suggesting that Mr. Padilla should pick Mr. Wilson out of the line-up.
37. As a result of the false arrest, plaintiff was forced to hire an attorney to defend himself from the bogus criminal charges and was caused to attend court multiple times to defend the same criminal charges, from January 31, 2014, until September 6, 2016.
38. That while in custody at Riker's Island Mr. Wilson was attacked numerous times by other inmates.
39. That while in custody at Riker's Island, Mr. Wilson was beaten by other inmates multiple times in the shower. On one occasion, another inmate attacked Mr. Wilson with a scalpel pushing the plaintiff into a desperate fight for his life.
40. That after this incident, Mr. Wilson was placed in solitary confinement known as "the box" for eleven consecutive months during which time,

Mr. Wilson was confined to his cell for 23 hours a day and for an hour each day, was confined to a solitary eight foot by eight foot cage in the yard for recreation.

41. That plaintiff suffered mental damage and degradation and sought psychiatric and psychological treatment. Mr. Wilson received counseling and psychological treatment from the NYC Department of Corrections Medical Facilities, and was placed on the medication, Rimron, for 20 months, while at Riker's Island.
42. That on or about May 5, 2016, Raymond Padilla recanted his suborned statement identifying Salim Wilson as a perpetrator of the shooting of January 31, 2014. Mr. Padilla informed Assistant District Attorney (ADA) Cheryl Thill, that Salim Wilson did not commit the crimes with which he was charged.
43. That despite this recantation, the defendants continued with their prosecution of Mr. Wilson for murder from May 5, 2016, until September 6, 2016.
44. That on or about September 6, 2016, after approximately 20 court appearances over a three year period, all criminal charges against Salim Wilson, stemming from the arrest of January 31, 2014, were dismissed without trial.

**FIRST CAUSE OF ACTION: AGAINST DETECTIVE DANIEL  
BRADY AND THE CITY OF NEW YORK FOR THE ARREST OF  
(Assault and Battery)**

45. Plaintiff re-alleges all the allegations contained in all preceding paragraphs of this complaint with full force and effect as though set forth at length herein.
46. On or about February 11, 2014, at the criminal court in the Bronx, defendant Brady, by means of warrant officers whose names are currently unknown, acting according to his instructions, jointly and severally in their capacity as police officers wrongfully touched, grabbed, handcuffed and seized the plaintiff SALIM WILSON, in an excessive manner about his person, causing him physical pain and mental suffering. At no time did the defendants have legal cause to grab, handcuff, seize, or touch the plaintiff, nor did the plaintiff consent to this illegal touching, nor was it privileged by law.
47. Consequently, plaintiff has been damaged and hereby demands compensatory and punitive damages against DETECTIVE BRADY and THE CITY OF NEW YORK in an amount to be proven at trial against each of the defendants, individually and severally.
48. The defendant officers were at all material times acting within the scope of their employment, and as such, the defendant CITY OF NEW YORK is vicariously liable for the defendant officers acts described above.

**SECOND CAUSE OF ACTION: AGAINST DETECTIVE  
DANIEL BRADY AND THE CITY OF NEW YORK  
(False Arrest)**

49. As and for a second cause of action: Plaintiff repeats and re-alleges preceding allegations of this complaint with full force and effect as though set forth at length herein.
50. On or about February 11, 2014, at the Criminal Courthouse, in the Bronx, the defendant Brady, without a lawfully obtained warrant order or other legal process, and without any legal right, wrongfully and unlawfully arrested the plaintiff, restrained him and his liberty and then took him into custody to a police station in the County of the Bronx. The plaintiff was thereafter held in custody over the course of approximately 31 months until he was released on or about September 6, 2014. The defendant intentionally confined the plaintiff without his consent and the confinement was not otherwise privileged by law, and at all times, the plaintiff was conscious of his confinement.
51. Consequently, plaintiff has been damaged and hereby demands compensatory and punitive damages in an amount to be proven at trial against DETECTIVE BRADY.
52. The defendant officers were at all material times acting within the scope of their employment, and as such, the defendant CITY OF NEW YORK, is vicariously liable for the defendant officers actions described above.

**THIRD CAUSE OF ACTION: AGAINST DETECTIVES  
BRADY, TERRELL AND THE CITY OF NEW YORK  
(False Imprisonment)**

53. Plaintiff repeats and re-alleges all the allegations contained in the preceding paragraphs of this complaint with full force and effect as though set forth at length herein.
54. On or about February 11, 2014, in the Bronx, the defendants, jointly and severally, without any valid warrant, order or legal process and without any legal right, wrongfully and unlawfully imprisoned the plaintiff, restrained his liberty and then took him into custody and caused him to be incarcerated as a detainee in New York City's Correctional Facility. The plaintiff was thereafter held in custody for 31 months before he was released. The defendants intentionally confined the plaintiff without his consent and the confinement was not otherwise privileged by law and at all times, plaintiff was conscious of his confinement.
55. Consequently, plaintiff has been damaged and hereby demands compensatory and punitive damages in an amount to be proven at trial against Detectives BRADY and TERRELL individually and severally.
56. The defendant officers were at all material times acting within the scope of their employment, and as such, the defendant CITY OF NEW

YORK, is vicariously liable for the defendant officers actions described above.

**FOURTH CAUSE OF ACTION: AGAINST DETECTIVES  
BRADY, TERRELL AND THE CITY OF NEW YORK  
(Malicious Prosecution)**

57. Plaintiff incorporates, repeats and re-alleges all of the allegations contained in all preceding paragraphs of this complaint with full force and effect as though set forth at length herein.
58. From on or about February 11, 2014, to September 6, 2016, the defendants, jointly and severally, maliciously prosecuted plaintiff for the crimes of murder, attempted murder and manslaughter although they had no lawful reason to believe that he in fact committed those crimes they intentionally prosecuted him for those crimes with an intent to unlawfully punish, intimidate and harass the plaintiff, and thereby they caused plaintiff severe damages including loss of liberty, physical injury to his person, and severe mental suffering.
59. On or about September 6, 2016, after 31 months of unlawful imprisonment, all the false criminal charges against the plaintiff were dismissed without trial.
60. Consequently, plaintiff has been damaged and hereby demands compensatory and punitive damages in an amount to be proven at trial against DETECTIVES BRADY and TERRELL, individually and severally.

61. The defendant officers were at all material times acting within the scope of their employment, and as such, the defendant CITY OF NEW YORK, is vicariously liable for the defendant officers actions described above.

**FIFTH CAUSE OF ACTION: AGAINST DETECTIVE DANIEL BRADY AND THE CITY OF NEW YORK**

**(False arrest/imprisonment: unlawful search and seizure deprivation of rights in violation of the 4<sup>th</sup> and 14<sup>th</sup> amendments, brought pursuant to 42 U.S.C. 1893)**

62. By this reference, plaintiff incorporates each and every allegation and averment set forth in the preceding paragraphs of this complaint as though fully set out herein.
63. In the arrest, detention and imprisonment of plaintiff on or about February 11, 2014, defendants, acting under color of state law, deprived the plaintiff of his right to be free from unreasonable search and seizure and arrest without probable cause or reasonable suspicion as required by the Fourth and Fourteenth Amendments, therefore, defendants are liable for violation of 42 U.S.C. Section 1983 which prohibits the deprivation under color of state law of rights secured under the United States Constitution.
64. The defendants subjected the plaintiff to such deprivations, either in a malicious or reckless disregard of the plaintiff's rights or with deliberate indifference to those rights under the fourth and fourteenth amendments to the United States Constitution.

65. As a result of the aforesaid violation, plaintiff has been caused to suffer humiliation, great mental and physical anguish, embarrassment and scorn among those who know him, was prevented from attending to his necessary affairs, and has been caused to incur legal expenses, and has been otherwise damaged in his character and reputation.
66. Consequently, plaintiff has been damaged and hereby demands compensatory and punitive damages in an amount to be proven at trial against each defendant, individually and severally.
67. The defendant officers were at all material times acting within the scope of their employment and as such, the defendant, the CITY OF NEW YORK, is vicariously liable for the defendant officers acts as described above.

**SIXTH CAUSE OF ACTION: AGAINST DETECTIVES  
BRADY, TERRELL AND THE CITY OF NEW YORK**

**(Malicious Prosecution/Deprivation of Liberty in violation of  
the 4<sup>th</sup> and 14<sup>th</sup> amendments, brought pursuant to 42 U.S.C.  
1893)**

68. By this reference, plaintiff incorporates each and every preceding allegation and averment of this complaint as though fully set forth herein.
69. That DETECTIVES BRADY AND TERRELL were directly involved in the initiation of criminal proceedings against the plaintiff.

70. That the defendant officers lacked probable cause to initiate criminal proceedings against the plaintiff.
71. That the defendant officers acted with malice in initiating criminal proceedings against the plaintiff.
72. That the defendant officers were directly involved in the continuation of criminal proceedings against the plaintiff.
73. That the defendant officers lacked probable cause in continuing criminal proceedings against the plaintiff.
74. That the defendant officers acted with malice in continuing criminal proceedings against the plaintiff.
75. That the defendant officers misrepresented and falsified evidence throughout all phases of the criminal proceeding.
76. That the defendant officers misrepresented and falsified evidence to the prosecutors in the Bronx County District Attorney's office.
77. That the defendant officers withheld exculpatory evidence from the prosecutors in the Bronx County District Attorney's office.
78. That the defendant officers did not make a complete statement of facts to the prosecutors in the Bronx County District Attorney's office.
79. The arrest, imprisonment and prosecution of the plaintiff was malicious and unlawful, because plaintiff had committed no crime and there was no probable cause to believe that plaintiff had committed any crimes.

80. The defendant officers actions were intentional, unwarranted and in violation of the law. The defendant officers had full knowledge that the charges made before the court against the plaintiff were false and untrue.
81. By their conduct as described above, and acting under color of state law, defendants are liable to the plaintiff under 42 U.S.C. §1983 for the violation of his constitutional right to be free from malicious prosecution under the Fourth and Fourteenth Amendments to the United States Constitution.
82. As a consequence of the malicious prosecution by the defendant officers, plaintiff's suffered a significant loss of liberty, humiliation, mental anguish, depression, and his constitutional rights were violated. Plaintiff hereby demands compensatory damages and punitive damages, in an amount to be determined at trial, against DETECTIVE DANIEL BRADY and DETECTIVE DAVID TERRELL individually and severally.
83. The defendant officers were at all material times acting within the scope of their employment and as such, the defendant, the CITY OF NEW YORK, is vicariously liable for the defendant officers acts as described above.

**SEVENTH CAUSE OF ACTION**  
**(Monell Claim)**

84. Plaintiff incorporates, repeats and re-alleges all of the preceding allegations of this complaint with full force and effect as though set forth at length herein. This cause of action is brought pursuant to 42 U.S.C. § 1983 for violations of the Fourth and Fourteenth Amendments to the United States Constitution. It applies to the City of New York and police officers sued in their official capacity and should be characterized as a "Monell" claim).
85. Defendants CITY OF NEW YORK has grossly failed to train and adequately supervise its police officers in the fundamental law of arrest, search and seizure especially when its police officers are not in possession of a court authorized arrest and/or search of individuals warrant, especially with respect to the principle and policy that the arrest should be based on probable cause.
86. The City of New York was negligent and/or deliberately indifferent by failing to implement a policy with its police department and instruct police officers who, absent the consent of the Plaintiff (or similarly situated individuals) or without the possession of a court authorized arrest a search warrant, said police officers of the City of New York are not to arrest individuals such as the Plaintiff here where probable cause is lacking.

87. The City of New York is negligent or has acted with deliberate indifference due to its failure to implement a policy with its Police Department or actively enforce the law, if any of the following are lacking: Probable cause must be present before an individual such as the plaintiff herein can be arrested.
88. The City of New York is negligent or has acted with deliberate indifference due to its failure to implement a policy with its Police Department that prohibits, and punishes Police Officers for manufacturing false evidence against criminal defendants.
89. The foregoing acts, omissions and systemic failures are customs and policies of the CITY OF NEW YORK which caused the police officers to falsely arrest, illegally seize and search, maliciously prosecute, improperly manufacture evidence against, and suborn false testimony against the Plaintiff, under the belief that they would suffer no disciplinary actions for their failure to take proper or prudent steps in this case.
90. The defendant's deliberate indifference is further evident by and through the lack of meaningful investigation and punishment of transgressors. Upon information and belief, the NYPD Internal Affairs Bureau (IAB) investigations rarely lead to administrative trials, and when they do, and the charges are somehow sustained, the punishment is minimal, thereby lacking any deterrent effect.

91. Upon information and belief, officers operated with the tacit approval of their supervisors and up the ranks, with an "ends justifying the means" mentality. This mentality includes a custom or practice of stopping, or stopping and frisking first, then establishing reasonable suspicion after the fact. Use of force was viewed as collateral damage of the stop and frisk policy established by the NYPD.
92. Police officers were rarely, if ever brought up on charges, investigated or disciplined for their over aggressive attempts to solve crimes including manufacturing evidence, and brutalizing witnesses.
93. Precinct commanders and supervisors were rarely, if ever, investigated, disciplined, reassigned or retained due to their own observations of misconduct, review of data or complaints from citizens for 4<sup>th</sup> Amendment violations, illegal search and seizure, illegal entry into citizen's homes without a warrant, false arrests, witness intimidation, submitting false police reports and other constitutional rights violations occurring in their command, under their watch.
94. Defendant the City of New York by its police department, acted with deliberate indifference to the need to reform their customs and practices which included as stated herein, rampant examples of constitutional violations of its citizenry, thereby lending tacit approval to the unconstitutional conduct. Upon information and belief, the City, the police commissioner and/or the named defendants herein, were

more interested in meeting "numbers" than they were safeguarding the constitutional rights of its citizens.

95. The acts of police officers who violate the civil and constitutional rights of the citizens of New York routinely go unreported by fellow police officers, not investigated by their superior officers, and consequently their acts, actions, omissions go unpunished. Failure to intervene and report is the norm, not the exception. Consequently, the acts of police officers who use excessive force, profile citizens racially, make false arrests, make false charges, falsely detain citizens and make false reports against them, make warrantless entry into the homes of citizens, etc, are condoned by other officers present, their supervisors, precinct commanders, and the police commissioner.
96. The City of New York and NYPD's tolerance for brutality, excessive force, illegal and/or retaliatory arrests, and the emphasis to "come down hard on quality of life infractions" leads to a systemic practice and policy wherein City officials are tolerant, both outwardly and inwardly of police brutality, silence in the face of such brutality and/or illegal stops, frisks, searches, seizures and/or arrests, warrantless entry into citizen's homes and quota arrests. A systemic practice where officers who report said misconduct are not viewed as "good cops" but rather as outcasts and "snitches" and are isolated, ostracized and often transferred, thereby perpetuating the illegal conduct of other officers.

97. There is a pervasive pattern, custom and de facto policy of the City of New York to allow its police officers to violate the constitutional rights of citizens, as reported in the New York Daily News expose of Sunday May 19, 2013 where the Daily News reported a litany of unconstitutional actions taken by the NYPD teams of police officers that have been the subject of lawsuits and departmental hearings but resulted in virtually no reprimands to the offending officers, rather, one officer was promoted to a Lieutenant even when his actions were known to be unconstitutional.
98. The defendants subjected the plaintiff to these deprivations, either in a malicious or reckless disregard of the plaintiff's rights or with deliberate indifference to those rights under the fourth and fourteenth amendments to the United States Constitution.
99. The direct and proximate result of the Defendant's acts are that the plaintiff has suffered severe and permanent injuries of both of a physical and psychological nature, was forced to endure pain and suffering, all to his detriment.

**WHEREFORE**, plaintiff, SALIM WILSON, demands judgment against the defendants, jointly and severally, in an amount of damages which exceeds the monetary jurisdictional limits of any and all lower courts which would otherwise have jurisdiction in the amount determined upon trial of this action.

Dated: New York, New York

July **27**, 2017

/S/

Chukwuemeka Nwokoro  
Nwokoro & Scola, Esquires  
Attorney for the Plaintiff  
44 Wall Street, Suite 1218  
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(212) 785-1060

**VERIFICATION**

STATE OF NEW YORK )  
COUNTY OF NEW YORK )

I, the undersigned, an attorney duly admitted to practice law in the State of New York, under penalties of perjury do affirm;

That I am the attorney of record for the plaintiff in the within matter and make this affirmation in accordance with CPLR 3020. I have read the within SUMMONS AND VERIFIED COMPLAINT and know the contents thereof to be true to your affiant's own knowledge, with the exception of those matters therein stated to be alleged upon information and belief. Your affiant bases his belief regarding those matters upon the contents of the file and conversation with the plaintiffs.

This verification is made by your affiant and not by the plaintiff for the following reason; plaintiff resides in a different County than where your affiant maintains an office.

Dated: New York, New York  
July **27**, 2017

/S/  
CHUKWUEMEKA NWOKORO